

Appendix 1 - Responses to consultation on

'Shopfronts and Signage Supplementary SPD

No	Name	Comment	Response
EXTERNAL			
Crime Prevention Design Advisor, LB Lambeth Police Division			
1		Section 2.5 should make reference to the inclusion of a security statement.	Accepted - Para 2.5 now reads: 'Design and access statements should explain how the design responds to and enhances its surroundings and how crime prevention has been considered within the design.'
2		Section 2.18 should recommend the Secured By Design (SBD) standards for commercial glazing - 6.4mm laminated glass	Accepted – Para. 2.18 has been amended to now read: 'Specialist glass can often be fitted into existing shopfronts without the need for any specific alteration to the appearance of the building. This should where possible and achievable comply with the Secured by Design minimum standards of 6.4mm laminated glass. Internal blinds conceal the contents of window displays and thus discourage 'smash and grab' attacks.'
3		Sections 2.19 - 2.22 should state that shutters should meet the SBD standards. External fittings/fixtures should be as vandal resistant as possible.	Partially Accepted - Section 2.17 has been amended and now reads: 'It is important that premises are secure and safe however this should not be to the detriment of the appearance of the host building or to the amenity of the street. The Secured by Design initiative provides detailed advice on improving security and care should be taken that where appropriate all new fixtures and fittings should comply with these minimum standards. All new fixtures and fittings should be robust and vandal resistant. There are a range of acceptable security solutions.'

			Section 2.16 notes that where recessed entrances form part of a shopfront and are of concern gates can be installed to improve security. This mitigates the concerns raised regarding recesses and therefore the suggested amendment is not accepted.
4		Applicants should be asked to consider the use of anti-graffiti coatings on shop fascias and minimise recesses.	Accepted - A new paragraph (2.25) has been inserted: - 2.25 Products that resist graffiti adherence or facilitate easy removal of graffiti should be considered in vulnerable locations. For example polished granite or tiled finishes, as found on late Victorian shopfronts, are easily cleaned or graffiti. Propriety anti-graffiti coatings may also be considered.
5		CCTV & lighting should also be considered and appropriate SBD rated products used - perhaps a link to the relevant section of the Minimum Standards could be provided?	Accepted – New section 2.24 now reads: 'CCTV and additional lighting should only be installed in response to an identified need and should not be considered a replacement for passive surveillance. Care must be taken to ensure that such fittings are as unobtrusive as possible and do not detract from the character of the property. Excessive numbers of such fittings can add unwanted visual clutter and are unlikely to be deemed acceptable. On listed buildings and buildings with ornate frontages the acceptability of CCTV and lighting will need to be carefully considered.'
	GLA		
		No comment.	Noted
	English Heritage, London Region		
6		The SPD criterion needs to make specific / explicit reference to the historic environment.	Not Accepted - Section 1.10 is headed "historic environment" and addresses this point satisfactorily.
7		Should refer to PPG15	Accepted - Section 1.4 added and reads:

			'PPG15 'Planning & the Historic Environment' sets out the matters that should be considered when dealing with proposals that affect listed buildings, buildings within conservation area and other elements of the historic environment. Proposals which fail to preserve the special character of listed buildings or to preserve or enhance the character or appearance of conservation areas should not be accepted.'
	Russ Curlew, Building Design Consultant		
8		The guidance is considered adequate.	Noted
	Brixton Market Traders Federation		
9		Over the last 10 years shops in the CA have been allowed to develop in a manner that is contrary to the guidance contained within the SPD. The document does not address these changes and what has been permitted to happen without consent should be returned on a like for like basis	Concern noted. Action cannot be taken retrospectively in relation to policy and guidance which has only now been introduced. The SPD provides current guidance on the Council's expectation of all new design and elaboration of policy. Para 2.6 notes that existing poor examples of shopfronts will not be regarded as a precedent.
	Waterloo Quarter Business Alliance (WQBA)		
10		Design Principles - in general the design principles can be supported. However there is an over reliance upon traditional examples. There should be a greater diversity of shopfronts examples including good contemporary schemes.	Accepted – Final document will include images of good quality contemporary design.
11		Materials & Construction Details - guidance indicates a strong preference for reinstatement of original shopfront features even where they are not retained. Would welcome guidance facilitating opening up shopfronts onto the street for restaurants, cafes, bars etc...	Accepted – New section added 'Shops with Open Frontages' 2.26-2.27 Some existing shops opening onto markets have no shopfronts and are secured at night by a roller shutter; this form of development is unlikely to be acceptable elsewhere. In recent years the provision of folding doors across a cafe, bar or restaurant frontages has become popular. These will be deemed acceptable where: -

			<ul style="list-style-type: none"> • Installation would not result in the loss of a shopfront of interest. • The design is of high quality with materials appropriate for the building. • This would not impede the use of the footway. • There would be no adverse impact on amenity of adjoining residents, and • This would not result in a clear increased opportunity for crime. <p>In sensitive locations, such as in conservation areas, open frontages may be also resisted if they are not an established feature of the area. In conservation areas particular care should be taken to ensure the design preserves or enhances the character or appearance of the conservation area.'</p>
12		Security - need to include guidance on the types of shutters that will be deemed acceptable i.e. mesh over solid to improve borrowed lighting levels and reduce fear of crime.	Not Accepted - Guidance is already provided on the types of shutter in paras 2.19 - 2.22.
13		Shopfront Conversions & Extensions - proposes the removal of the statement regarding the opposition of extension above eaves level as this could restrict mixed use development etc...	Not Accepted - There is nothing within the guidance that relates to extension above eaves level. Para 2.33 states that first floor extensions or enclosures above projecting single storey shopfronts will not be considered acceptable. This is in line with policy 37 of the adopted UDP. Therefore no alterations are to be made.
INTERNAL			
Development Control			
14		There is an absence of guidance on the design and installation of ATMs in shopfronts.	Accepted – New section 2.30 ‘Automated Telling Machine (ATM) Installations’ added: - ‘Where ATM units are proposed for shopfronts their detailing should be carefully considered and well executed. On conventional shopfronts the unit should fit into the glazing; solid panels or wall infill instead of glass should not be proposed. On ornate buildings such as banks care should

			be taken to ensure that architectural features of value are not harmed by the installation.'
15		The section on shopfront conversions (to residential use etc) should be repeated and amplified in the SPD on Residential Alterations and Extensions as that will be the first place most customers will look for it.	Accepted. No change. This is addressed in the SPD on Residential Extensions and Alterations.
	Cllr Diana Morris		
16		Most of the examples that are shown are traditional shopfronts. It would be good to show a few good examples and provide an explanation of why they are considered acceptable	Accepted - Final document will include images of good quality contemporary design.

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